

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

ISAAC W. CAPPS,	)	
	)	
Plaintiff	)	
	)	
vs.	)	No. 14-441-NJR-DGW
	)	
KEVIN DRAKE, JARED FREEMAN	)	
SHAWN ISAACS, JAMES TROGOLO	)	
KEVIN ROYE AND BRICE SHAFFER	)	
	)	
Defendants.	)	

**DEFENDANTS, KEVIN ROYCE AND BRICE SHAFFER’S,  
RESPONSE TO PLAINTIFF’S MOTION FOR AWARD  
OF ATTORNEY FEES (DOC. 186)**

NOW Come the Defendants, Kevin Roye and Brice Shaffer, by Bleyer and Bleyer, their attorneys, and for their Response to Plaintiff’s Motion for Award of Attorney Fees (Doc.186) say:

1. The Plaintiff has filed herein a Motion for Award of Attorney’s Fees with ten exhibits which was docketed as Doc. 186 as well as his Memorandum in Support of the Motion which was docketed as Doc. 187.

2. Defendant James Trogolo has filed a Response to the Motion which was docketed as Doc. 201 with attachments and Defendants Kevin Drake, Jared Freeman and Shawn Isaacs have filed a Response to the Motion docketed as Doc. 202 with attachments.

3. The Responses presented by Defendant Trogolo (Doc. 201) and Defendants Drake, Freeman and Isaacs (Doc. 202) are persuasive and present the identical argument of Defendant Kevin Roye and Brice Shaffer for their Response to Plaintiff's Motion for Attorney Fees. In the interests of Judicial economy and avoiding redundancy, Defendants Kevin Roye and Brice Shaffer hereby adopt as their argument in their Response to Plaintiff's Motion for Award of Attorney Fees the argument set forth by Defendant James Trogolo in Doc. 201 and attachments and the argument set forth by Defendants Kevin Drake, Jared Freeman and Shawn Isaacs in Doc. 202 and attachments.

WHEREFORE, for the reasons articulated in the Response of Defendant James Trogolo in Doc. 201 and attachments and the reasons articulated in the Response of Defendants Kevin Drake, Jared Freeman and Shawn Isaacs in Doc. 202 and attachments, Defendants Kevin Roye and Brice Shaffer respectfully request this Honorable Court DENY Plaintiffs fee petition or in the alternative to significantly reduce the fee request to comply with Seventh Circuit guidelines.

BLEYER and BLEYER

S/Joseph A. Bleyer  
Attorney Registration No. 6193192  
Attorneys for Defendants, Kevin Roye and  
Brice Shaffer

BLEYER AND BLEYER

Attorneys at Law

601 West Jackson Street

Post Office Box 487

Marion, IL 62959-0487

Telephone: (618)997-1331

Facsimile: (618)997-6559

e-mail: jableyer@bleyerlaw.com

***CERTIFICATE OF SERVICE***

I hereby certify that on March 10, 2016, I electronically filed Defendants, Kevin Roye and Brice Shaffer's Response to Plaintiff's Motion for Attorney Fees with the Clerk of the Court using CM/ECF System which will send notifications of such filing to the following:

Mrs. Jude M. Redwood  
Redwood Law Office  
Post Office Box 864  
St. Joseph IL 61873  
redwoodlaw42@hotmail.com

Ms Emman Dorothy Steimel  
Assistant Attorney General  
Attorney General's Office  
500 South Second  
Springfield, IL 62706-0001  
esteimel@atg.state.il.us

Mr. James C. Cook  
Walker and Williams, PC  
4343 West Main Street  
Belleville, IL 62226-5502  
jcc@wawpc.net

I hereby certify that on March 10, 2016, I mailed by United States Postal Service, the documents to the following nonregistered participants:

None

S/JOSEPH A. BLEYER

BLEYER AND BLEYER  
Attorneys at Law  
601 West Jackson Street  
Post Office Box 487  
Marion, IL 62959-0487  
Telephone: (618)997-1331  
Facsimile: (618)997-6559  
e-mail: jableyer@bleyerlaw.com